



SAXENA WHITE

10 Bank Street | 8th Floor | White Plains, NY 10606

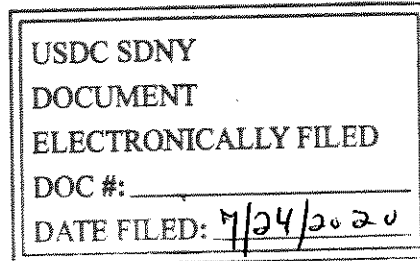
MEMO ENDORSED

Steven B. Singer
ssinger@saxenawhite.com

July 21, 2020

VIA ECF

Honorable Denise L. Cote
United States District Court Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312



Re: *In Re Perrigo Company PLC Securities Litigation*
Case No.: 1:19-cv-00070-DLC

Dear Judge Cote:

We represent Lead Plaintiffs City of Boca Raton General Employees' Pension Plan and Palm Bay Police and Firefighters' Pension Fund ("Plaintiffs") in the above-captioned matter. For the reasons set forth below, Plaintiffs respectfully submit this Letter Motion for leave to file, under seal, a revised version of the Proposed Letters Rogatory¹ accompanying Plaintiffs' Motion for Issuance of Letters Rogatory (the "Motion," ECF No. 98), and for leave to file a public version of the same with redactions in the form attached hereto as Exhibit A.

On June 26, 2020, Plaintiffs filed their Motion to seek the attendance of relevant witnesses at oral depositions in Ireland as well as the production of relevant documents. ECF No. 98. On July 6, 2020, Defendant Perrigo Company plc filed a memorandum of law in opposition to Plaintiffs' Motion to the extent that Plaintiffs' Proposed Letters Rogatory sought discovery from certain representatives of Ireland's Office of the Revenue Commissioners ("Irish Revenue"). ECF No. 104. On July 13, 2020, Plaintiffs filed their reply in further support of the Motion. ECF No. 115.

On July 16, 2020, the Court "decline[d] to issue the proposed letters rogatory to Irish Revenue or its employees," and ordered Plaintiffs to "file a revised version of the proposed letters rogatory that does not seek discovery from Irish Revenue or its employees." ECF No. 119 at pp. 1-2. Accordingly, pursuant to the Court's July 16, 2020 Order, Plaintiffs respectfully submit, along with this Letter Motion, a revised Proposed Letters Rogatory that does not seek

¹ The Proposed Letters Rogatory were initially filed on June 26, 2020 as Exhibit 1 to the Motion (ECF No. 100-1), and subsequently sealed by the Court's July 7, 2020 Order. ECF No. 106. Plaintiffs also filed a redacted, public version of the Proposed Letters Rogatory (ECF No. 103-1) and a highlighted version under seal (ECF No. 102-1), in support of their Letter Motion for Leave to File Certain Documents Under Seal. ECF No. 101. On July 9, 2020, at the instruction of the Court's Orders and Judgments Clerk, Plaintiffs filed a revised version of the Proposed Letters Rogatory (ECF Nos. 109-1, 110-1) along with their motion for leave to file under seal (ECF No. 109), which was granted by the Court's July 16, 2020 Order. ECF No. 119.

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discovery from Irish Revenue, with redactions in the form attached hereto as Exhibit A. The redactions have been made in furtherance of the Court's July 7, 2020 and July 16, 2020 Orders granting Plaintiffs' motions for leave to file under seal (ECF Nos. 106, 119), and to ensure compliance with the Confidentiality Order governing this case. ECF No. 90. Additionally, Plaintiffs have separately filed under seal an unredacted copy of their revised Proposed Letters Rogatory with proposed redactions highlighted, in accordance with Rule 7.B of the Court's Individual Rules of Practice. Plaintiffs' proposed redactions are substantively similar to those in the prior redacted versions of the Proposed Letters Rogatory.

We thank the Court for its time and consideration in this matter.

Respectfully,

/s/ Steven B. Singer
Steven B. Singer

cc: Counsel for all parties (via ECF)

Granted.
Denise Cote
7/24/20